

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE TAKE-TWO INTERACTIVE
SECURITIES LITIGATION

No. 1:06-cv-00803-RJS

ECF Case

**SUPPLEMENTAL AFFIDAVIT OF JONATHAN M. PLASSE IN SUPPORT OF
THE PROPOSED SETTLEMENT, PLAN OF ALLOCATION, AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

STATE OF NEW YORK)
) ss. :
COUNTY OF NEW YORK)

JONATHAN M. PLASSE, being duly sworn, deposes and says:

1. I am member of the law firm of Labaton Sucharow LLP, attorneys for Plaintiffs in the above-captioned consolidated class action. I am a member in good standing of the Bar of this Court and I have personal knowledge of the facts detailed herein.

2. This Affidavit is respectfully submitted to address matters arising subsequent to submission of my previous Affidavit in Support of the Proposed Settlement, Plan of Allocation, Award of Attorneys' Fees and Reimbursement of Expenses, sworn to September 14, 2010, and is submitted in further support of Plaintiffs' motion for final approval by the Court of the proposed settlement of the above-captioned litigation, the related plan of allocation, and Lead Counsel's application for an award of attorneys' fees and reimbursement of expenses. Capitalized terms not defined herein have the respective meanings ascribed in my Affidavit sworn to September 14, 2010.

3. Pursuant to the Notice sent to the Class, the period to request exclusion from the Class expired on September 21, 2010 and the period to file objections expired on September 28, 2010.

4. Plaintiffs and Lead Counsel have received no notice of further objections to the proposed Settlement subsequent to the date of my prior Affidavit. In addition, a previously-unknown Class member has taken the unusual step of making an unsolicited submission in support of the Settlement. A true and correct copy of such submission is annexed hereto as Exhibit 11.

5. As reported in the Supplemental Affidavit of Stacey B. Fishbein Regarding Notice Implementation, Requests for Exclusions and Claims Received to Date, sworn to on October 5, 2010, A.B. Data, Ltd., the Court-approved Claims Administrator, has received 8,918 claim forms as of October 4, 2010.

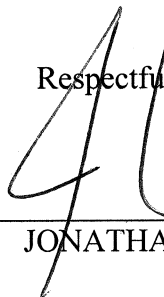
6. With respect to requests for exclusion from the Class, A.B. Data, Ltd. has received a single request for exclusion from the Class, from an individual, Eli Wilamowsky ("Mr. Wilamowsky"), who identifies himself as having "sold Take-Two Interactive Software, Inc. common stock short during the class period, selling and then buying 924, 500 shares." A true and correct copy of Mr. Wilamowsky's exclusion request is annexed hereto as Exhibit 12.

7. There is a genuine issue as to whether Mr. Wilamowsky – a "short seller" – is a member of the Class. The Class is defined as consisting of investors who "purchased or otherwise acquired" Take-Two common stock during the Class Period, and because a short seller seeks to profit from the decline in the price of a security, Mr. Wilamowsky's economic interests were the opposite of a purchaser's. Mr. Wilamowsky recently filed a separate lawsuit against certain of the Defendants in this Action; a true and correct copy of Mr. Wilamowsky's complaint in such action (excluding exhibits) is annexed hereto as Exhibit 13. Mr. Wilamowsky designated his action as related to this Action, and it was referred to this Court, the Honorable Richard J. Sullivan, on September 29, 2010, as "possibly related" to this Action.

8. Mr. Wilamowsky's status as a Class member may be relevant to the issue of whether he is entitled to rely on the pendency of this Action to toll the statute of limitations, and may otherwise affect his ability to prosecute his separate action. There is no dispute, however, that Mr. Wilamowsky timely filed an otherwise-valid request for exclusion from the Class, and accordingly, there is no dispute that Mr. Wilamowsky, as either a non-Class member or Class member who has opted out of the Class, is not affected by the Judgment which Plaintiffs propose the Court enter to implement the Settlement. A proposed form of Exhibit A to such Judgment (identifying persons who have duly requested exclusion from the Class, pursuant to paragraph 6 thereof) is annexed hereto as Exhibit 14.

WHEREFORE, I respectfully request that the Court approve in their entirety the proposed Settlement, the Plan of Allocation, and the Fee and Expense Request.

Respectfully submitted,



JONATHAN M. PLASSE

Sworn to and subscribed before me
this 5th day of October, 2010



NOTARY PUBLIC

ETHAN DAVID WOHL
Notary Public, State of New York
No. 02W05055964
Qualified in New York County
Commission Expires June 17, 2014